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THE PUBLIC SAFETY COMMUNICATIONS COUNCIL
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"For the Public's Safety"

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FEDERAL COMMUNICATIONS COMMISSION
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July 30, 1993

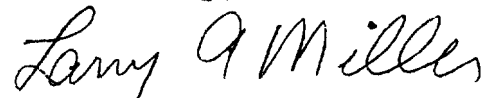
Office of the Secretary
Federal Communications Commission
1919 M Street, Room 239
Washington, D.C. 20554

Dear Sir or Madam:

Enclosed are an original and nine copies of the Public Safety Communications Council's reply comments to PR Docket 92-235 concerning to Replacement of Part 90 by Part 88 to Revise the Private Land Mobile Radio Services and Modify the Policies Governing Them.

Do not hesitate to so inform me should you have comments or questions regarding this submittal.

Yours truly,



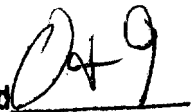
Larry A. Miller, Chairman
Public Safety
Communications Council

LAM:tcd

enclosures

cc: Public Safety Communications Council
AASHTO Special Committee on Communications

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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OFFICE OF THE SECRETARY

In the Matter of

Replacement of Part 90 by Part 88 to
Revise the Private Land Mobile Radio
Services and Modify the Policies
Governing Them

PR Docket No. 92-235

REPLY COMMENTS
OF THE
PUBLIC SAFETY COMMUNICATIONS COUNCIL

Larry A. Miller, Chairman

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of) PR Docket No. 92-235
)
Replacement of Part 90 by Part 88 to)
Revise the Private Land Mobile Radio)
Services and Modify the Policies)
Governing Them)

To: The Commission

Reply Comments
of the
PUBLIC SAFETY COMMUNICATIONS COUNCIL

The Public Safety Communications Council (PSCC) has reviewed many of the comments submitted to the Commission in PR Docket No. 92-235, and has noticed with satisfaction that a large number of the comments filed in the proceeding generally agree with those submitted by PSCC collectively and its member organizations individually.

The PSCC is an organization of associations which the Commission has certified as the representative Frequency Coordinators for the Emergency Medical, Fire, Forestry-Conservation, Highway Maintenance, and Special Emergency Radio Services, as provided in the Commission's Part 90 rules, and others.

The executive and sponsoring members of the Council include the American Association of State Highway and Transportation Officials (AASHTO); the Forestry-Conservation Communications Association

(FCCA); the International Association of Fire Chiefs (IAFC); the International Association of Fish & Wildlife Agencies (IAFWA); the International Municipal Signal Association (IMSA); the National Association of Business and Educational Radio (NABER); and the National Association of State Foresters (NASF). In addition, the National Association of State Emergency Medical Service Directors has joined in support of PSCC's comments and reply comments in PR Docket No. 92-235.

PSCC wishes to focus its reply comments on these issues only:

(1) How channels newly derived by narrowing the spacing between existing frequencies in the public safety radio services are to be assigned to the various services, and

(2) The Frequency Coordination system which is the most equitable in making sure all of the Public Safety services benefit from the new channels according to the public interest and the needs of the services.

Accordingly, the members of PSCC advocate the following:

The hybrid pooling concept set forth by PSCC in its original comments in this proceeding is preferable to either the "status quo" approach offered by the Associated Public-Safety Communications Officers (APCO) or the Commission's consolidation proposal because it combines the best of both proposals.

Under the hybrid pooling approach, Public Safety services will retain their current frequencies and their homogeneity which is so important to Public Safety frequency management; and they will obtain the benefit of adjacent, newly created channels. This will provide these services with contiguous blocks of channels, and will give licensees more flexibility in determining which types of technology to implement.

At the same time, the hybrid concept allows for the restoration of the Local Government Radio Service as a true pool of those frequencies available to all Public Safety services and coordinated by all certified Public Safety Frequency Coordinators.

PSCC made clear in its original comments in this proceeding that the vast majority of Public Safety radio systems operating in the United States are using frequencies below 800 megahertz. This will remain the case for an indefinite, possibly very lengthy period of time.

If this proposal is adopted by the Commission, the members of PSCC would endeavor to work closely together and with others to develop, throughout the Public Safety services, a frequency management plan for the pooled channels. The intent behind this proposal is to facilitate the most efficient use of the pooled channels while maintaining an open coordination process.

Conclusion

Permitting multiple coordinators to provide service in the general pool provides an opportunity to test the pooling concept in a controlled environment.

The Public Safety Communications Council requests that the Commission consider and act favorably upon these reply comments as it proceeds with this matter.

Respectfully submitted,
Public Safety Communications Council

By: Larry A. Miller
Larry A. Miller, Chairman
Public Safety Communications Council